

14. The call router system of claim 13 wherein the router executes on a processor.
15. The call router system of claim 14 wherein the processor upon which the router executes is the managing processor.
16. The call router system of claim 14 wherein the processor upon which the router executes is a processor separate from the managing processor.
17. The call router system of claim 14 wherein routing rules are maintained at the individual agent's computer workstation and the router requests routing from the individual agent's computer workstation.
18. The call router system of claim 14 wherein routing rules for connected agent's computer workstations are maintained separately on the processor that executes the router, and wherein routing is accessed from the routing rules according to destination information for received calls.

REMARKS

The present response is under Rule 116 to the Office Action mailed October 26, 1999 in the above-referenced case, made Final. Claims 2-18 are presented for examination. Claims 2-8 and 10-18 are rejected under 35 U.S.C. 102(e) as being anticipated by Dekelbaum (U.S. Patent number:

5,838,682) hereinafter Dekelbaum. Claims 2-10 and 12-18 are also rejected under 35 U.S.C. 102(e) as being unpatentable over Bateman (US Patent 5,884,032) hereinafter Bateman.

Applicant has carefully studied the prior art provided by the Examiner. Applicant herein argues that the references provided by the Examiner clearly fail to teach the structural elements or the routing processes as described in applicant's claimed invention. Applicant's claims, which are left unchanged in the present amendment, distinguish unarguably over the references as cited and applied by the Examiner. Applicant therefore respectfully requests that the response be entered, the rejections withdrawn, and the case be allowed to pass quickly to issue.

Claim 2 recites:

2. A method for routing Internet Protocol Network Telephony (IPNT) calls at customer premises having a managing processor and a computer workstation coupled to the managing processor, the managing processor having a set of routing rules specific to and accessible and editable by a person assigned to the computer workstation, the method comprising steps of:

- (a) receiving an IPNT call at the managing processor;*
- (b) determining the person assigned to the workstation is an intended recipient for the call;*
- (c) requesting routing by the managing processor from the specific set of current routing rules accessible and editable by the person assigned to the computer workstation; and*

(d) routing the call according to the current routing rules specific to the person.

The Examiner has rejected claim 2 under § 102 (e) as being anticipated by Dekelbaum or Bateman. Applicant's claim 2 clearly recites a method for routing Internet Protocol Network Telephony (IPNT) calls at customer premises having a managing processor and a computer workstation coupled to the managing processor, the managing processor having a set of routing rules specific to and accessible and editable by a person assigned to the computer workstation, and the managing processor routes incoming IPNT calls according to the routing rules.

Both Dekelbaum and Bateman teach Internet servers supplying Web pages or HTML documents to potential customers accessing the respective URLs on the said Internet server, wherein calls are only connected between agents and customers when the customer calls back the merchant facility or call center after viewing the HTML document or the agent calls the customer after receiving a request from the customer via a link from the HTML document.

The Examiner equates the Internet servers with the managing processor recited in claim 2. Applicant respectfully traverses the Examiner's position that the Internet servers as taught in Dekelbaum and Bateman route IPNT calls, or any other kinds of calls, according to any routing rules. The Internet servers in the prior art absolutely do not route the received IPNT call according to current routing rules specific to a person at a connected workstation. Actually, neither the Internet server 102 of Dekelbaum or the WWW server 28 of Bateman route incoming IPNT calls at all.

Dekelbaum clearly teaches that the Internet server **102** may be accessed by a client "surfing the net" or, if the URL of the Merchant's home page is known, go directly to the home page, i.e., initiate a connection with server **102** which responds by sending the client the specified resource or HTML object requested. The HTML object, or document, retrieved by the client may include a telephone number to be used by the client to access an agent at the merchant facility. Dekelbaum teaches a method of coordinating between Internet accesses and incoming PSTN calls by causing the Internet server 102 to maintain a record of pages accessed by a particular client, i.e. a session history, and to issue a session ID to a client upon the client requesting a HTML document. The sales representative solicits the session ID from each caller upon initial contact (after routing has occurred and receipt of the call by the agent) and uses it to retrieve the session history for that client from the Internet server **102** (column 6). This is not routing IPNT calls received to specified destinations, as claimed in applicant's invention.

The Examiner refers to the "sessions" stored at the Internet server **102** of Dekelbaum as being the same as the "routing rules" used by applicant's managing processor to route the incoming IPNT calls.

Applicant teaches that in telephony routing systems, it is the software in general wherein routing rules are set, and the routing rules determine the decision-making paths a system follows in routing calls. Applicant does not believe that the "sessions", which are no more than a history of previously viewed WEB pages by a customer, referred to in the art of Dekelbaum can be compared to "routing rules" as taught in applicant's claimed invention.

Bateman teaches that a session starts with a customer **2** calls, via its Internet access line **6** into the WWW server **28** and commences a self-serve

session with an organization which subscribes to Customer Contact Channel Changer service (box 2-1). There may be on-line help "Live Help" available to the customer, that when initiated by the customer from the HTML document produces an additional HTML form that must be filled out by the customer. The help request messages are then received at the HTTP server 46 and time-stamped. An outbound dialing system 32 in call center 24 dials the customer (PSTN call) requesting the information and connects an available agent along with the customer information from the HTML form. **Clearly**, the WWW server 28 of Bateman is not routing the received IPNT call to an agent according to routing rules.

Applicant must respectfully request that both the references of Dekelbaum and Bateman be withdrawn as they do not route IPNT calls received at a managing processor as claimed in applicant's invention.

In the IPNT world, as disclosed in applicant's invention, IP addresses are used instead of telephone numbers, and there are differences in the way data packets are formulated and transmitted. Moreover, what may be termed routing is done by such as IP switches and hubs, wherein destination addresses may be changed. These differences, however, are not limiting in embodiments of the present invention.

In many embodiments of applicant's invention, the inventions are involved with new and unique ways to use machine intelligence for telephony functions, particularly, but not exclusively, as these functions relate to call centers and intelligent routing of calls. In instances of the invention described, the principles of the invention may also be applied to IPNT without undue experimentation.

As examples of IPNT application, in those embodiments dealing with personal routing and personal routers, the methods and apparatus

described may also be adapted to IPNT so personal routing rules, negotiation, and the like may be provided for IPNT calls as well.

Applicant believes that claim 2 is clearly patentable over the art provided by the Examiner as the references clearly do not route incoming IPNT calls.

Applicant respectfully requests the 102(e) rejection be withdrawn regarding the references of Dekelbaum and Bateman. Claim 2 is then clearly patentable over the art provided. Claims 3-9 are now patentable on their own merits, or at least as depended from a patentable claim.

Claim 10 herein recites:

10. In a customer premises Internet Protocol Network Telephony call center having a managing processor including sets of routing rules specific to individual agents at workstations, the managing processor for switching received calls to individual ones of the connected agents at computer workstations, a method for individual customization of routing rules for the received calls, comprising steps of:

- (a) executing a client user interface on one of the computer workstations by an agent at the station;*
- (b) determining routing for the received calls addressed to the computer workstation at the computer workstation by the agent at the workstation using the client user interface;*
- (c) transmitting the routing determination to a router executing on the managing processor; and*

(d) routing the received telephone calls by the router according to the transmitted routing determination.

Claim 10 has also been rejected by the Examiner under 102(e) using the art of Dekelbaum and Bateman. The Examiner rejects claim 10 using the same reasoning provided in regards to claim 2. Applicant has argued on behalf of claim 2 that the art of Dekelbaum and Bateman simply do not apply to the present invention because neither reference is capable of routing Incoming IPNT calls received at a managing processor. Both references require either an additional (PSTN) call from the customer, or a (PSTN) call back from an agent.

Applicant believes claim 10 is patentable over the art of Dekelbaum and Bateman as argued on behalf of claim 2. Claim 12 is also patentable at least as depended from a patentable claim.

Claim 13 recites a call router system also determining routing of incoming Internet Protocol Network Telephony calls in a customer premises call center including a managing processor connected to individual computer workstations, the managing processor having sets of routing rules specific to individual agents.

Claim 13 has the same limitations argued on behalf of claim 2 and 10 above, therefore, claim 13 is also patentable over the art of Dekelbaum and Bateman. Claims 14-18 are patentable at least as depended from a patentable claim.

As all of the claims standing for examination as amended have been shown to be patentable over the art of record, applicant respectfully requests

reconsideration and that the present case be passed quickly to issue. If there are any time extensions due beyond any extension requested and paid with this amendment, such extensions are hereby requested. If there are any fees due beyond any fees paid with the present amendment, such fees are authorized to be deducted from deposit account 50-0534.

Respectfully Submitted,
Igor Neyman, et al.

by _____


Donald R. Boys
Reg. No. 35,074

Donald R. Boys
Central Coast Patent Agency
P.O. Box 187
Aromas, CA 95004
(831) 726-1457